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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF OREGON
9 MEDFORD DIVISION

10 In re the Matter of J.P. and E.P.:

11 ARNAUD PARIS,

12 Petitioner,

13 and

14 HEIDI MARIE BROWN,

15 Respondent.

Civil Action No. 1:24-cv-00648-AA

SUPPLEMENTAL OBJECTION TO
RESPONDENT'S MOTION TO
DISMISS FOR RESPONDENT'S
COUNSEL LACK OF CONFERRAL

16 Respondent's counsel has been ignoring Petitioner's request to confer on
17 Respondent's motion to dismiss filed on May 28th 2024. Petitioner has been following
18 Honorable Judge Aiken's advice to review closely the local rules in regard to filing documents
19 in this matter and it appears that per Chapter 5 of the ORCP and also LR 7-1, LR 1-4, FRCP26
20 and LR 83-6, Respondent's counsel had an obligation to confer with Father on their *Motion*
21 *to Dismiss Petition for Return of Children* filed on May 28th.

22 Respondent's counsel failed to do so properly and therefore Petitioner requests this
23 Honorable Court to dismiss Respondent's motion based on this lack of conferral. Here are the
24 factual pieces of evidence supporting Petitioner's request to this Honorable Court:
25

SUPPLEMENTAL OBJECTION

1 Father, Petitioner tried to communicate with Katrina Seipel, Respondent's counsel on
2 July 3rd, July 4th and July 9th regarding Respondent's *Motion to Dismiss Petition for Return*
3 *of Children*. On the email communication was also CCed Miss Katelyn Skinner and Miss
4 Wendy Goodyear who are also working at the Buckley Law firm and who are assisting Miss
5 Seipel in this matter. Miss Seipel and her colleagues from Buckley Law ignored each of these
6 emails and refused to answer Petitioner to set a time for conferral.
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8 -See attached Exhibit 01, email sent by Petitioner to Respondent's counsel on July 3rd 2024.
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10 -See attached Exhibit 02, email sent by Petitioner to Respondent's counsel on July 4th 2024.
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12 -See attached Exhibit 03, email sent by Petitioner to Respondent's counsel on July 9th 2024.
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14 Respondent is in violation of the ORCP rules and this gives ground to this Honorable
15 Court to dismiss Respondent's *Motion to Dismiss Petition for Return of Children*. The reason
16 Petitioner is filing this supplemental objection now is because the confirmation and proof of
17 Respondent's counsel refusal to confer only happened in the last few days.

18 Petitioner would like to take this opportunity to also remind this Honorable Court that
19 since Father filed his Hague Petition on April 16th 2024 and since Mother, Respondent,
20 abducted Eva and Juliette from France on or about April 8th 2024, Mother has prevented the
21 children from doing any video calls with Father or their French family. In that context
22 Petitioner also would like to inform this Honorable Court that his Mother, Katia Paris, the
23 children's French Grandmother, was admitted at the French ER recently on June 28th and
24 even though she had been made aware of this context, Mother, Respondent, refused to let the
25 children communicate with their French grandmother who they are really close to.

SUPPLEMENTAL OBJECTION

2 -See attached Exhibit 04, proof of Katia Paris's admittance to the French ER on June 28th.

3 -See attached Exhibit 05, whatsapp message Eva and Juliette's French Aunt to Respondent
4 about their grandmother admitted at the ER on June 28th and asking Mother Respondent to
5 let them do a video call with their French Grandmother, which Mother ignored.

6 As a result, Petitioner respectfully requests this Honorable Court to dismiss
7 Respondent's motion filed on May 28th and to proceed expeditiously to the Hague Abduction
8 Action per article 11 of the 1980 Hague Convention for the return of the children to France.
9

10
11 DATED this 15th day of July, 2024, in Paris, France

12 Submitted by:
13 Arnaud PARIS, Pro Per

14
15
16 13 rue Ferdinand Duval
17 75004 Paris, FRANCE
18 +33.6.88.28.36.41

19 **VERIFICATION**

20 I, Arnaud Paris, declare under penalty of perjury under the laws of the United States
21 of America that the foregoing is true and correct.

22 SIGNED AND DATED this 15th day of July, 2024, in Paris, France.

23
24 

Arnaud Paris

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **SUPPLEMENTAL OBJECTION TO RESPONDENT'S MOTION TO DISMISS FOR RESPONDENT'S COUNSEL LACK OF CONFERRAL** on the following party:

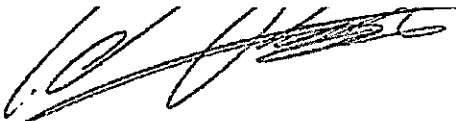
Katelyn Skinner at kds@buckley-law.com
Katrina Seipel at kas@buckley-law.com
Attorneys for Respondent

By the following method or methods:

prepaid envelopes, addressed to the attorney(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

ixing full, true, and correct copies thereof to the attorney(s) at the fax number(s)

DATED this 15th day of July, 2024, in Paris, France.



ARNAUD PARIS
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